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Insurance Company of Illinois

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA RODRIGUEZ, an individual and as
the natural parent on behalf of: I C, J C, J J C,
minors,

Plaintiffs,

v.

ERICA OLSON, an individual, SAFECO
INSURANCE COMPANY OF ILLINOIS, a
foreign limited liability company, DOE
MANAGERS I through X; DOE
EMPLOYEES I through X; DOE OWNERS I
through X; DOE; ROE EMPLOYERS XI
through XX; DOES XXI through XXV; and
ROE CORPORATIONS, XXV through XXX,
inclusive, jointly and severally,

Defendants.

Case No. 2:24-cv-00587-JAD-EJY

**STIPULATION AND ORDER REMANDING
CASE BACK TO STATE COURT**

ECF No. 6

This Stipulation is entered into by and between Plaintiffs MARIA RODRIGUEZ, an individual and as the natural parent on behalf of: I C, J C, J J C, minors, (hereafter "Plaintiffs") and Defendants ERICA OLSON and SAFECO INSURANCE COMPANY OF ILLINOIS (hereafter "Defendants"), by and through their counsels of record.

The parties, acting by and through their respective attorneys of record, hereby agree and stipulate that the total value of the case, all causes of action included, will not exceed \$75,000 per

1 Plaintiff, exclusive of costs, interest and computed without regard to any setoff or counterclaim to
2 which Defendant may be adjudged to be entitled.

3 The parties, acting by and through their respective attorneys of record, further agree and
4 stipulate to remand of this case from Federal to State Court, and request the Court enter an order
5 remanding this case to the Nevada Eighth Judicial District Court, County of Clark. The grounds for
6 remand of this action are that diversity jurisdiction is no longer proper pursuant to 28U.S.C. 1332(a)
7 because the value of this case is less than \$75,000.

8 The parties, by the undersigned counsel for each party, agree that this Stipulation may be
9 signed by counsel, and that all counsel listed below have authorized the submission of this
10 Stipulation to this Court.

11 IT IS SO STIPULATED:

12 DATED this 2nd day of April, 2024

13 D.R. PATTI & ASSOCIATES

14
15 By /s/ Troy A. Clark
16 Troy A. Clark, Esq.
17 Nevada Bar No. 11361
18 720 S. Seventh Street, Third Floor
19 Las Vegas, Nevada 89101
20 Telephone: (702) 331-3391
21 Facsimile: (702) 385-9557

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1 DATED this 2nd day of April, 2024

2 McCORMICK, BARSTOW, SHEPPARD,
3 WAYTE & CARRUTH LLP

4 By /s/ Jonathan W. Carlson
5 Jonathan W. Carlson, Nevada Bar No. 10536
6 Mandy Vogel, Nevada Bar No. 16150
7 8337 West Sunset Road, Suite 350
8 Las Vegas, Nevada 89113
9 Attorneys for ERICA OLSON and SAFECO
10 INSURANCE COMPANY OF ILLINOIS

11 **ORDER**

12 Based on the parties' stipulation [ECF No. 6] and because it appears that this court lacks
13 subject-matter jurisdiction over this matter, IT IS ORDERED that this case is **REMANDED back**
14 **to the Eighth Judicial District Court, Clark County, Nevada, Case Number A-24-887618-C,**
15 **Department 3. The Clerk of Court is directed to SEND** a copy of the docket sheet for this case
16 **along with this remand order to the state court and CLOSE THIS CASE.**

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18 U.S. District Judge Jennifer A. Dorsey
19 Dated: April 5, 2024
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